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VIA ECF Filing

Hon. Taryn A. Merkl, U.S.M.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Fair Housing Justice Center, Inc. et al. v. Juda Niayzov et al.*
Civil Case No.: 1:24-cv-04201
FKB File No.: 302.175

Dear Judge Merkl:

Our firm represents Womcore LLC d/b/a Remax Edge and Xian Jin Zhang (collectively, “Remax”) in the above-referenced matter. We write in response to Plaintiff’s letter motion requesting a “discovery conference” for a “motion to compel.” *See* ECF Dkt. No. 67.

As Plaintiffs note, we informed Plaintiffs by writing several times that we would take specific steps to address any purported deficiencies with Remax’s document production. We wrote that “in an effort to proceed in good faith, we will make additional efforts to locate further responsive documents based on the word document and jpeg file you provided yesterday, and will even go above and beyond and seek to acquire phone call records which may be accessible to our client online;” and would “work in good faith to diligently search for discovery which may be missing.” We asked Plaintiffs to specifically state in writing what discovery categories were in dispute, but Plaintiff did not provide any items other than those requests for which we had already agreed to expend time searching for again (or new, unrelated requests).

For this reason, as we informed Plaintiffs’ counsel, we could not take part in a joint letter which made the erroneous representation that the parties have made “a good faith effort to resolve disputes before making any discovery motion,” as required by this Court’s Individual Practices.¹ It is still unclear what relief Plaintiff seeks that the parties have not already resolved to address.

Respectfully submitted,

FURMAN KORNFELD & BRENNAN LLP

Spencer A. Richards
Asher Kest

¹ We also informed Plaintiffs that their took up almost the entirety of the five pages permitted by this Court, leaving no room for the collective defendants.